

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	:	
	:	:	
UNITED STATES OF AMERICA	:	:	<u>SEALED</u>
	:	:	<u>SUPERSEDING INDICTMENT</u>
- v. -	:	:	
	:	:	S1 22 Cr. 142 (VSB)
ZUKEILA PLAZA,	:	:	
a/k/a "Keila,"	:	:	
MAURICE SINCLAIR,	:	:	
a/k/a "Skino,"	:	:	
a/k/a "Ski,"	:	:	
LAWRENCE GREEN,	:	:	
a/k/a "Lzz,"	:	:	
a/k/a "LJ,"	:	:	
LOUIS LAWRENCE,	:	:	
a/k/a "Adam,"	:	:	
a/k/a "Anthony,"	:	:	
a/k/a "A,"	:	:	
DEION JOHNSON,	:	:	
a/k/a "Billz,"	:	:	
a/k/a "Black,"	:	:	
NATHAN SMITH,	:	:	
a/k/a "Youngin,"	:	:	
a/k/a "600,"	:	:	
a/k/a "Six,"	:	:	
ESTIBEN OLIVA,	:	:	
a/k/a "Mula,"	:	:	
JOHN GRAVES,	:	:	
a/k/a "Nephew,"	:	:	
ALI DOBY,	:	:	
a/k/a "Lee Drilly,"	:	:	
a/k/a "Fifty,"	:	:	
GODDES EARL,	:	:	
a/k/a "Asia,"	:	:	
JAVON HOSKINS,	:	:	
a/k/a "Jason,"	:	:	
a/k/a "Twin," and	:	:	
JOHN HENDRICKS,	:	:	
a/k/a "Tyson,"	:	:	
a/k/a "Fred,"	:	:	
	:	:	
Defendants.	:	:	
- - - - -	x	:	

COUNT ONE

(Narcotics Conspiracy)

The Grand Jury charges:

Overview of the Conspiracy

1. From at least in or about March 2019 up to and including at least in or about June 2022, in the Southern District of New York and elsewhere, ZUKEILA PLAZA, a/k/a "Keila," MAURICE SINCLAIR, a/k/a "Skino," a/k/a "Ski," LAWRENCE GREEN, a/k/a "Lzz," a/k/a "LJ," LOUIS LAWRENCE, a/k/a "Adam," a/k/a "Anthony," a/k/a "A," DEION JOHNSON, a/k/a "Billz," a/k/a "Black," NATHAN SMITH, a/k/a "Youngin," a/k/a "600," a/k/a "Six," ESTIBEN OLIVA, a/k/a "Mula," JOHN GRAVES, a/k/a "Nephew," ALI DOBY, a/k/a "Lee Drilly," a/k/a "Fifty," GODDES EARL, a/k/a "Asia," JAVON HOSKINS, a/k/a "Jason," a/k/a "Twin," and JOHN HENDRICKS, a/k/a "Tyson," a/k/a "Fred," the defendants, and others known and unknown, formed a drug trafficking organization (the "DTO") that took over the lobby and multiple apartments of an apartment building located at 2685 Valentine Avenue in the Bronx, New York. Working in shifts during the day and the night on a day-to-day basis for over three years, the DTO and its members, including the defendants, multiple of whom typically carried firearms with them, distributed cocaine base, in a form commonly known as "crack," which was manufactured on site, as well as heroin and fentanyl to a large base of end-user

customers. Occupying the public spaces of this building and thereby denying its many residents, including families with children, safe access to their homes, the DTO and its members, including the defendants, operated freely, creating an open market for drugs.

Statutory Allegations

2. From at least in or about March 2019 up to and including at least in or about June 2022, in the Southern District of New York and elsewhere, ZUKEILA PLAZA, a/k/a "Keila," MAURICE SINCLAIR, a/k/a "Skino," a/k/a "Ski," LAWRENCE GREEN, a/k/a "Lzz," a/k/a "LJ," LOUIS LAWRENCE, a/k/a "Adam," a/k/a "Anthony," a/k/a "A," DEION JOHNSON, a/k/a "Billz," a/k/a "Black," NATHAN SMITH, a/k/a "Youngin," a/k/a "600," a/k/a "Six," ESTIBEN OLIVA, a/k/a "Mula," JOHN GRAVES, a/k/a "Nephew," ALI DOBY, a/k/a "Lee Drilly," a/k/a "Fifty," GODDES EARL, a/k/a "Asia," JAVON HOSKINS, a/k/a "Jason," a/k/a "Twin," and JOHN HENDRICKS, a/k/a "Tyson," a/k/a "Fred," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

3. It was a part and an object of the conspiracy that ZUKEILA PLAZA, a/k/a "Keila," MAURICE SINCLAIR, a/k/a "Skino," a/k/a "Ski," LAWRENCE GREEN, a/k/a "Lzz," a/k/a "LJ," LOUIS LAWRENCE, a/k/a "Adam," a/k/a "Anthony," a/k/a "A," DEION

JOHNSON, a/k/a "Billz," a/k/a "Black," NATHAN SMITH, a/k/a "Youngin," a/k/a "600," a/k/a "Six," ESTIBEN OLIVA, a/k/a "Mula," JOHN GRAVES, a/k/a "Nephew," ALI DOBY, a/k/a "Lee Drilly," a/k/a "Fifty," GODDES EARL, a/k/a "Asia," JAVON HOSKINS, a/k/a "Jason," a/k/a "Twin," and JOHN HENDRICKS, a/k/a "Tyson," a/k/a "Fred," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

4. The controlled substance that ZUKEILA PLAZA, a/k/a "Keila," MAURICE SINCLAIR, a/k/a "Skino," a/k/a "Ski," LAWRENCE GREEN, a/k/a "Lzz," a/k/a "LJ," LOUIS LAWRENCE, a/k/a "Adam," a/k/a "Anthony," a/k/a "A," ESTIBEN OLIVA, a/k/a "Mula," and JOHN HENDRICKS, a/k/a "Tyson," a/k/a "Fred," the defendants, conspired to distribute and possess with intent to distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A).

5. The controlled substances that DEION JOHNSON, a/k/a "Billz," a/k/a "Black," NATHAN SMITH, a/k/a "Youngin," a/k/a "600," a/k/a "Six," JOHN GRAVES, a/k/a "Nephew," ALI DOBY, a/k/a "Lee Drilly," a/k/a "Fifty," GODDES EARL, a/k/a "Asia," and JAVON HOSKINS, a/k/a "Jason," a/k/a "Twin," the defendants,

conspired to distribute and possess with intent to distribute were: (i) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A), and (ii) mixtures and substances containing detectable amounts of heroin and fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Firearms Offense)

The Grand Jury further charges:

6. From at least in or about March 2019 up to and including in or about June 2022, in the Southern District of New York, ZUKEILA PLAZA, a/k/a "Keila," MAURICE SINCLAIR, a/k/a "Skino," a/k/a "Ski," LAWRENCE GREEN, a/k/a "Lzz," a/k/a "LJ," LOUIS LAWRENCE, a/k/a "Adam," a/k/a "Anthony," a/k/a "A," DEION JOHNSON, a/k/a "Billz," a/k/a "Black," NATHAN SMITH, a/k/a "Youngin," a/k/a "600," a/k/a "Six," GODDES EARL, a/k/a "Asia," and JAVON HOSKINS, a/k/a "Jason," a/k/a "Twin," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count One of this Indictment, knowingly did use and carry firearms, and in

furtherance of such crime, did possess firearms, and did aid and abet the same.

(Title 18, United States Code,
Sections 924(c)(1)(A)(i) and 2.)

COUNT THREE

(Felon in Possession of a Firearm)

The Grand Jury further charges:

7. On or about February 17, 2022, in the Southern District of New York, NATHAN SMITH, a/k/a "Youngin," a/k/a "600," a/k/a "Six," the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess a firearm, to wit, a .25-caliber Beretta semi-automatic pistol, and the firearm was in and affecting interstate and foreign commerce.

(Title 18, United States Code,
Sections 922(g)(1), 924(a)(2), and 2.)

FORFEITURE ALLEGATION

8. As a result of committing the offense alleged in Count One of this Indictment, ZUKEILA PLAZA, a/k/a "Keila," MAURICE SINCLAIR, a/k/a "Skino," a/k/a "Ski," LAWRENCE GREEN, a/k/a "Lzz," a/k/a "LJ," LOUIS LAWRENCE, a/k/a "Adam," a/k/a "Anthony," a/k/a "A," DEION JOHNSON, a/k/a "Billz," a/k/a "Black," NATHAN SMITH, a/k/a "Youngin," a/k/a "600," a/k/a "Six," ESTIBEN OLIVA, a/k/a "Mula," JOHN GRAVES, a/k/a "Nephew," ALI DOBY, a/k/a "Lee Drilly," a/k/a "Fifty," GODDES EARL, a/k/a

"Asia," JAVON HOSKINS, a/k/a "Jason," a/k/a "Twin," and JOHN HENDRICKS, a/k/a "Tyson," a/k/a "Fred," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSETS PROVISION

9. If any of the above-described forfeitable property, as a result of any act or omission of ZUKEILA PLAZA, a/k/a "Keila," MAURICE SINCLAIR, a/k/a "Skino," a/k/a "Ski," LAWRENCE GREEN, a/k/a "Lzz," a/k/a "LJ," LOUIS LAWRENCE, a/k/a "Adam," a/k/a "Anthony," a/k/a "A," DEION JOHNSON, a/k/a "Billz," a/k/a "Black," NATHAN SMITH, a/k/a "Youngin," a/k/a "600," a/k/a "Six," ESTIBEN OLIVA, a/k/a "Mula," JOHN GRAVES, a/k/a "Nephew," ALI DOBY, a/k/a "Lee Drilly," a/k/a "Fifty," GODDES EARL, a/k/a "Asia," JAVON HOSKINS, a/k/a "Jason," a/k/a "Twin," and JOHN HENDRICKS, a/k/a "Tyson," a/k/a "Fred," the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

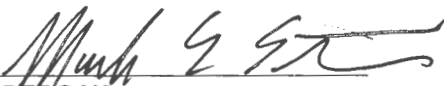
c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ZUKEILA PLAZA, a/k/a "Keila," et al.,
Defendants.

SEALED SUPERSEDING INDICTMENT

S1 22 Cr. 142 (VSB)

(Title 18, United States Code,
Sections 922(g)(1), 924(a)(2), 924(c),
and 2, and Title 21, United States
Code, Section 846.)

DAMIAN WILLIAMS
United States Attorney


Foreperson

6/21/22

Filed superseding Indictment under seal
Arrest warrants issued

USMT Gorenstein

ME